

Before the

)
) AU Docket No. 12-25
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)

COMMENTS OF EAGLE TELEPHONE SYSTEM, INC.

Introduction:

Eagle Telephone System, Inc. is designated as an eligible telecommunications carrier and is located in Richland, OR. Eagle Telephone System, Inc. provides land line communication services to customers in Richland, OR and the surrounding communities. Eagle Telephone System, Inc. also provides personal cellular service through its Snake River PCS subsidiary. Snake River PCS is a CLEC and receives USF High Cost support and provides cellular services including 3G to customers in Baker and Union Counties in Oregon.

Discussion and Findings:

This comment is in response to the Commission's request for comment on the Potentially Eligible Areas for Mobility Phase I Support. We understand that the Commission has elected to use American Roamer data as the basis for its determination of potentially eligible areas; because Snake River PCS has never submitted information of any kind to American Roamer we were particularly interested in testing the information provided by the Commission. We used the Commission's provided data file to map out areas within our own service area that we believed were adequately served with 3G coverage yet the Commission's data indicated were unserved or underserved and we undertook to test those road miles. We undertook these tests because we believe that it is of paramount importance that the information used to design the auction is accurate lest the Universal Service Fund be used to pay for areas already adequately served, or conversely areas that are inadequately served be omitted from the auction.

Due to time and manpower constraints we determined that we would only test census blocks within our service area. We conducted drive tests using our ZK Celltest equipment and determined that the we provided 3G (at least 1.5 Mbps download and 200 Kbps upload) coverage over greater than 90% of the road miles in the following census blocks which the Commission's American Roamer data indicated was unserved or underserved (all are located within Baker County, Oregon, CMA 608):

410019503002002

410019505001111

410019505001112
410019506003495
410019506003508
410019506003493
410019506003499
410019506003496
410019506003966
410019506003490
410019506003489
410019506003494
410019506003485
410019506003487
410019506003551
410019506003552
410019506003550
410019506003555
410019503002211
410019506003712
410019506003722
410019506003721
410019506003486
410019506003484
410019506003700

Conclusion:

As stated earlier we believe that the accuracy of the Mobility Phase 1 auction's data set is very important and, based on our findings stated above, we have doubts as to the accuracy of this data. We have been informed that American Roamer Data consists entirely of voluntarily submitted information from American Roamer subscribers, which we are not. With the exception of census block 410019506003700, Snake River PCS is the only provider serving census blocks we found to be inaccurately reported and thus it is easy to determine why they were erroneously reported. The Commission should consider how many small cell phone carriers like Snake River PCS are not members of American Roamer and may conclude that additional testing to ensure the accuracy of the data is necessary prior to the auction.

Respectfully submitted,



Michael Lattin, President
Eagle Telephone System, Inc.

DECLARATION OF EAGLE TELEPHONE SYSTEM, INC

I, Michael Lattin, do hereby declare under penalty and perjury under the laws of the United States of America, the following:

1. I am the President and an authorized office of Eagle Telephone System, Inc.
2. I have read the foregoing Comments, I have personal knowledge of the facts and representations set forth herein, and believe them to be true and accurate.



3.16.12

Date